



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

MAR 18 2004

Certified Mail No. 7001 0320 0002 4540 8653
Certified Receipt Requested

In reply, refer to WST-3

NOTICE OF VIOLATIONDiana Crane
Quality Manager
Associated Plating Co.
9636 Ann St.
Santa Fe Springs, CA 90670

Dear Ms. Crane:

On November 17, 2003, a hazardous waste investigation was conducted by representatives of the United States Environmental Protection Agency ("EPA"), accompanied by a representative from the Santa Fe Springs Fire Department Environmental Protection Division, at Associated Plating Co. located at 9636 Ann St., Santa Fe Springs, CA 90670, EPA Identification Number CAD043079110. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), as amended [42 U.S.C. 6927]. A copy of the investigation report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with the California authorized program under RCRA Subtitle C. Any omissions in the report shall not be construed as a determination of compliance with all applicable regulations.

Pursuant to Section 3008 of RCRA [42 U.S.C. 6928] you are required to perform the following tasks:

I) Perform a waste determination on the liquid underneath the grating in the nickel stripping area. If this liquid has already been containerized and transported offsite for disposal, please provide EPA with a copy of the manifest (or if this manifest was already included in your December 22, 2003 letter to EPA, please indicate the manifest number and date);

II) Create and implement a weekly inspection checklist to be used for all waste storage areas and satellite accumulation areas. This checklist should include at a minimum:

- **that all hazardous waste containers stored on the facility premises meet all labeling requirements;**
- **that no more than 55 gallons of a particular wastestream be stored at any satellite**

- accumulation area;
- that all hazardous waste containers be closed (including with locking rings) when waste is not being added or removed from the containers;
- that there be proper access to all hazardous waste containers;
- that all hazardous waste containers be in good condition;
- that no hazardous waste be stored beyond the permitted storage time;

Please send a copy of this checklist to EPA.

III) Install an internal alarm for the hazardous waste storage area, as is required under CCR Title 22 §66265.34(a). Please provide EPA photographic documentation of this;

IV) Please provide a complete contingency plan that includes a list of all emergency equipment, along with each emergency device's location and a brief description of the device, as required under CCR Title 22 §66265.52(e)

By copy of this letter, EPA is providing the State of California with notice of the referenced violations of Subtitle C of RCRA. EPA is also providing the State with notice that EPA may take appropriate enforcement action. The State of California may notify EPA of its intent to assume or decline responsibility to take such action to resolve the referenced violations. EPA reserves the right to take further enforcement action as it deems appropriate.

EPA routinely provides copies of investigation reports to state agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe this report contains privileged or confidential information, you may make a claim within fourteen (14) calendar days from the date of receipt of this letter. EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

This request for information is not subject to review by the Office of Management and Budget ("OMB") under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1). See, also, 5 C.F.R. §§ 1320.3(c), 1320.4, and 1320.6(a). Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons. 44 U.S.C. §3502(4), (11); 5 C.F.R. §§ 1320.4 and 1320.6(a).

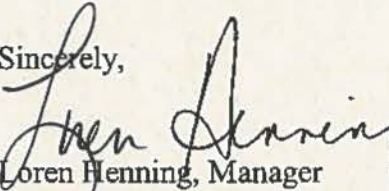
Your response to this request must be made by letter, signed by a duly authorized official, and submitted to EPA within thirty (30) calendar days from the date of receipt of this letter. Please address the submittal to:

Clint Seiter
Mailcode: WST-3
RCRA Enforcement Office
U.S. Environmental Protection Agency,
75 Hawthorne Street

San Francisco, CA 94105

If you have questions related to technical aspects of the investigation report or this letter, please contact Clint Seiter at (415) 972-3298.

Sincerely,


Loren Henning, Manager
RCRA Enforcement Office

Enclosure

cc w/o enclosure: Steve Lavinger, DTSC
Richard Kallman, Santa Fe Springs Fire Department



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

WASTE MANAGEMENT DIVISION

RCRA ENFORCEMENT OFFICE

Purpose: RCRA Compliance Evaluation Inspection

Facility: Associated Plating Co.
9636 Ann St.
Santa Fe Springs, CA 90670

EPA ID Number: CAD043079110

Date of Inspection: November 17, 2003

EPA Representatives: Clint Seiter
Environmental Protection Specialist
(415) 972-3298

Aubrey Baure
Environmental Scientist
(415) 972-3294

**Santa Fe Springs
Fire Department:** Richard Kallman
Environmental Protection Specialist
(562) 906-3810

Facility Representative: Diana Crane, Quality Manager
(562) 946-5525

Report Prepared By: Clint Seiter

Report Date: January 27, 2004

BACKGROUND

Facility Description

Associated Plating Company ("Associated Plating" or "the Facility") specializes in nickel metal plating, but also performs plating operations with copper, tin, tin-lead alloys, gold and silver. No cadmium or chromium plating is performed by the Facility. The Facility is located at 936 Ann St., Santa Fe Springs, CA, and has occupied its current location since the mid-1970s. The Facility currently employs 52 workers. Per the manifest database of the California Department of Toxic Substance Control (DTSC), Associated Plating generates sufficient quantities of RCRA hazardous waste to qualify as a Large Quantity Generator.

Per Associated Plating's 2001 Biennial Report, the Facility generated the following hazardous wastestreams:

- Rinse water from electroplating operations containing traces of lead (D008)
- Wastewater treatment sludge from plating operations containing metal hydroxide (F006)
- Rinse water from electroplating operations containing traces of cyanides (D003)
- Spent stripping solutions containing copper and nickel (D002)
- Spent tetrachloroethylene used for degreasing parts (F001)
- Spent gold stripping solution containing cyanide (F009)
- Spent silver and gold plating solutions containing cyanide (F007)
- Waste paint material (D001)

Associated Plating submitted an initial Notification of Hazardous Waste Activity on 8-15-80 identifying itself as a generator of F001, F006, F007, F008, and F009 hazardous waste (Attachment 2) and was assigned an EPA identification number of CAD043079110. The Facility renotified on 11-15-99 to inform EPA of a change of ownership, this time identifying itself as a large quantity generator of the following RCRA hazardous waste: D002, D003, F001, F006, F008 and F009 (Attachment 3).

Enforcement History

The EPA inspection database indicates that Associated Plating was previously inspected on 11-5-1992 by the California Department of Toxic Substance Control (DTSC) where pre-transport related generator violations were noted and subsequently corrected. The Facility was last inspected by the Santa Fe Springs Fire Department Environmental Protection Division on 2-7-02 (Attachment 4), where the following violations were noted:

- Labeling violations (no labels, unreadable labels, incomplete labeling);
- Storage together of incompatible wastes;
- Storage of hazardous wastes for over 90 days;
- Releases of hazardous wastes;
- Incomplete training records.

The Facility returned to compliance on 2-26-02.

Plating Process Description

Associated Plating operates four plating lines, as follows:

- Line 1: nickel, alkaline tin and acid tin plating;
- Line 2: tin, tin-lead, nickel plating (for parts requiring solderability);
- Line 3: nickel plating barrel line (for large volumes of small parts (nuts, bolts, etc.). Parts to be plated are placed in a barrel with a mesh screen, and the barrel is rotated in the plating solution);
- Line 4: Electroless nickel plating (used on aluminum substrates).

Plating operations differ from line to line, but the basic operation is as follows:

- Tank 1: Alkaline soak (removes oils and dirt from substrate);
- Tank 2: Electro-cleaner. Part is placed in an alkaline solution through which an electric current is run. Tanks vary in size, according to which line is used, from 70 gallons to 1300 gallons. Solution pH ranges from 12 to 13. Tank is changed every 3 to 6 months. Spent solution is processed through the Facility's wastewater treatment system;
- Tank 3: Rinse tank;
- Tank 4: Acid bath: 30% hydrochloric acid solution. Prepares substrate for the plating process. Bath is changed approximately every 2 months. Spent acid is neutralized on site, metals are precipitated out, and the remaining solution is processed through the wastewater treatment system;
- Tank 5: Nickel strike tank (used in nickel plating lines). Provides a more receptive substrate for the subsequent nickel plating. Solution consists of nickel chloride and hydrochloric acid, with an electric current passed through it;
- Tank 6: Rinse tank;
- Tank 7: Nickel plating tank (400 gallons): Electroplating operation using nickel sulfamate;

For parts requiring only a nickel plating, the process ends here. For a part that is to be gold-plated (with a nickel substrate) the process continues as follows:

- Tank 8 Gold strike. Solution of potassium gold cyanide with an inert anode of titanium mesh with a platinum coating. Solution is used indefinitely without changing, but with occasional replenishing;
- Tank 9 Gold plating tank. Solution of potassium gold cyanide, with an inert cathode. Electric current is passed through the solution and the part acts as a cathode, with the gold deposited on it;
- Tank 10 Gold drag out. A static tank. Current passing through the solution deposits trace amounts of gold on a plating cell for gold recovery.

The Facility also has a small laboratory in which the plating solutions are analyzed on a weekly basis. Both wet analysis and atomic adsorption analysis are performed in the lab. Solutions analyzed are returned to the baths once the analysis has been completed.

INVESTIGATION

The purpose of the investigation was to determine Associated Plating's compliance with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268 and 279, and the California Code of Regulations (CCR), Title 22, Division 4.5 and the California Health and Safety Code, Division 20, Chapter 6.5. On November 17, 2003, Clint Seiter and Aubrey Baure, representing the U.S. Environmental Protection Agency (EPA), and accompanied by Richard Kallman, representing the Santa Fe Springs Fire Department, conducted an unannounced site investigation at Associated Plating, Santa Fe Springs, CA (EPA ID# CAD043079110). Upon providing introductions and credentials, the inspectors contacted Ms. Diana Crane, the Facility's quality manager. The inspectors explained that this was a routine inspection to determine whether or not the Facility was in compliance with federal and state regulations concerning the proper management of RCRA and non-RCRA hazardous wastes. The inspection would consist of a walkthrough of the Facility, focusing on those areas where hazardous wastes were handled or stored, with photos taken, followed by a record review and a post-inspection outbriefing. In the course of the pre-walkthrough briefing, the inspectors provided Ms. Crane with a copy of the Small Business Regulatory Enforcement Fairness Act (SBREFA) Information Sheet.

Walk-Through Inspection (see Attachment 5 for a Facility layout)

-Plating Line 5

The inspectors noted the following:

- Four open, 15-gallon carboys containing spent nickel filters (a non-RCRA, California only hazardous waste) (Attachment 1, Photo 1). The carboys were unlabeled. In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), these filters were identified as a non-RCRA, California-only hazardous waste.

- Plating Line 1

The inspectors noted the following:

- One open, unlabeled, green 5-gallon bucket, 3/4 filled with a black liquid (Attachment 1, Photo 2). The Facility representative was unable to identify the bucket's contents at the time of the inspection. In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), this liquid was identified as "chromate rinse used in processing" returned to the rinse system;
- One open, unlabeled 5-gallon bucket, 1/8 full of unidentified black liquid (Attachment 1, Photo 3). In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), this liquid was identified as "chromate rinse used in processing" returned to the rinse system;

- One open, unlabeled 15-gallon carboy, 1/4 full with a clear liquid (Attachment 1, Photo 4). In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), this liquid was identified as "chromate rinse used in processing" returned to the rinse system;
- Two open, unlabeled 30-gallon containers of a clear liquid (Attachment 1, Photo 5). In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), this liquid was identified as "chromate rinse used in processing" returned to the rinse system;
- One 10-gallon container with a dark yellow liquid (Attachment 1, Photo 5) identified as "chromate rinse used in processing" returned to the rinse system;
- One unlabeled 55-gallon drum. In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), this liquid was identified as "copper solution removed from tank during pump repair - returned to tank";
- One 55-gallon, closed drum, labeled with the words: "chromium etch, cleaners line 4, tank 4, 6/11/03". In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), this was identified as "chromate rinse used in processing" that was returned to the rinse system;
- One 55-gallon, unlabeled, closed drum. In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), this liquid was identified as "chromate solution that had been decanted from a process tank - reused";

- Between Lines 1 and 3

The inspectors noted the following:

- One open, unlabeled 55-gallon drum, 1/8 full (Attachment 1, Photo 6). In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), this liquid was identified as "rinse water from chromate processing";
- Two unlabeled 15-gallon carboys (Attachment 1, Photo 7). In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), this liquid was identified as "spent sulfuric acid solution used for hourly cleaning of the electro coagulation unit". Per this letter, this was identified as a D002 hazardous waste, with an accumulation start date of 10-17-03. The waste was transported offsite for disposal on 12-16-03;
- One open, unlabeled 55-gallon drum, 3/4 full of a greenish liquid (Attachment 1, Photo 8). In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), this liquid was identified as "in-process sulfuric acid used for hourly cleaning of the electro coagulation unit";
- Three open, unlabeled 15-gallon containers, approximately 1/4 full (Attachment 1, Photo 9). In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), this liquid was identified as "evaporated chromate rinses. Returned to process tank to recover chemistry."
- Four, closed 55-gallon drums (Attachment 1, Photo 10):
 - 1st drum labeled: "line 3, copper flow, 3-13-03";
 - 2nd drum labeled: "line 3, copper flow, 3-13-03";
 - 3rd drum labeled: "copper rinse, 3-13-03";

- 4th drum labeled: "copper rinse, 3-13-03";

In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), drums' contents were identified as "water collected from routine berm cleaning" which was subsequently treated onsite via the Facility's wastewater treatment system;

- Two open black, 15-gallon carboys, 1 filled with a white solid, one filled with a white solid and 3 inches of liquid (Attachment 1, Photo 11). In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), solids identified as "solids from copper tank maintenance", with an F008 RCRA hazardous waste code. Per the letter the waste had been generated on 9-12-03 and had yet to be disposed of.

- Between Lines 2 and 4

The inspectors noted the following:

- Two tubes (one yellow, one black), filled with a milky fluid (Attachment 1, Photo 12). In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), this liquid was identified as "in-process solution used for tin stripping";
- One open, 5-gallon red bucket with a "Hazardous Waste" label, 1/8 full of clear liquid with a yellow deposit (Attachment 1, Photo 13). In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), this liquid was identified as "dehydrated rinses from chromate treatment", an F006 RCRA hazardous waste. Per the letter, the waste's accumulation start date was 9-12-03 and it had yet to be disposed of;

- Blasting Booth

Per the Facility representative, a mixture of silicon aluminum oxide and pumice is used as a blasting medium. Spent blasting medium is disposed of with the filter cake generated from the Facility's waste water treatment system (Attachment 1, Photo 14).

- Electroless nickel pumping room

Per the Facility representative, the pipes which convey the electroless nickel plating solution expand due to the heat generated in the Facility, and leak solution. There was an open catch basin underneath the pipes to collect any solution that leaks from the pipes. There was also an open, unlabeled bucket containing discarded steel wool plated with nickel (with spent electroless nickel plating solution, the nickel is plated out onto steel wool before the solution is processed out through the Facility's wastewater treatment system). This nickel plated steel wool is a non-RCRA, California only hazardous waste.

- Line 3

The inspectors noted the following (Attachment 1, Photo 15):

- One open, unlabeled, blue 5-gallon bucket;
- One open, unlabeled, white 5-gallon bucket containing an unidentified brown liquid;
- One open, unlabeled, white 2-gallon bucket containing an unidentified brown liquid;
- One open, unlabeled, red 5-gallon bucket containing an unidentified black liquid;

The Facility's letter to EPA dated December 22, 2003 (Attachment 7), stated that these buckets contained "alkaline cleaner from tank skimming". Per the Facility letter, this was a D002 RCRA hazardous waste generated on 11-17-03 and treated on site on 11-19-03.

- One open, unlabeled, blue, 15-gallon drum, 3/4 filled with black liquid. The Facility's letter to EPA dated December 22, 2003 (Attachment 7), stated that this drum contained "cleaner sludge from tank maintenance"(Attachment 1, Photo 16) that was returned to the process tank.

- Waste Storage Yard (Stripping Area)

Per the Facility representative, occasionally errors occur in the nickel plating process, and the part has to be stripped of the nickel by immersion in a hydrochloric acid solution and replated. Spent stripping solution is stored in this area for neutralization.

The inspectors noted 21 55-gallon drums of spent electroless nickel plating solution (a non-RCRA hazardous waste) in the stripping area. None of the drums were labeled (Attachment 1, Photo 17). The immediate stripping room consisted of a 15'x10' bermed area covered with a grate (Attachment 1, Photo 18). The inspectors noted that the area beneath the grating was filled with liquid. A piece of litmus paper was applied to the liquid, and the inspectors determined that the liquid had a pH of approximately 1, which would qualify the liquid as a D002 RCRA corrosive hazardous waste.

-Waste Storage Yard (Main Area)

The main waste storage yard was a large, enclosed exterior area filled with 55-gallon drums, none of them labeled except for a number written on the sides or tops (Attachment 1, Photos 19-21). The Facility representative informed the inspectors that numbers identified the drums in a central tracking system database. Per the representative, many of the drums contained hazardous wastes (either RCRA or non-RCRA, California only), some contained non-hazardous waste, and some contained product. The representative said that the database indicated there were 193 drums in the yard. This conformed to the rough estimate that the inspectors made (a more accurate count was difficult because drums were dispersed in various parts of the yard). In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), the Facility provided an inventory of the drums, identifying their contents, their waste codes (if applicable) and their accumulation start dates, when possible. Based upon this inventory, the following table summarizes the RCRA hazardous waste containers stored in the waste storage yard at the time of the inspection:

TABLE 1

Drum #	Waste name	Waste code	Accumulation start date	Disposal date	# days stored
1	Nickel strip	D002	8-7-03	12-12-03	128
2	Nickel strip	D002	8-21-03	12-12-03	114
5	Nickel strip	D002	8-7-03	12-12-03	128
6	Nickel strip	D002	8-21-03	12-12-03	114
7	Nickel strip	D002	9-4-03	12-12-03	100
9	Unknown acidic	D002	unknown*	12-10-03	?
25	Unknown acidic	D002	10-8-03	12-10-03	64
26	Unknown acidic	D002	10-9-03	12-10-03	63
27	Unknown acidic	D002	10-11-03	12-10-03	61
30	Unknown alkaline	D002	unknown*	12-5-03	?
35	Nickel strip	D002	9-11-03	12-12-03	93
36	Nickel strip	D002	9-25-03	12-12-03	79
40	Silver strip	D002	unknown*	still at site	?
41	Silver strip	D002	unknown*	still at site	?
42	Nickel strip	D002	9-18-03	12-12-03	77
47	Nickel strip	D002	10-16-03	12-12-03	58
49	Nickel strip	D002	7-24-03	12-12-03	142
52	Unknown acidic	D002	10-10-03	12-5-03	57
55	Liquid from filters	F006	10-3-03	10-17-03	14
60	Unknown acidic	D002	10-15-03	12-10-03	57
61	Unknown acidic	D002	9-22-03	12-10-03	80
62	Unknown acidic	D002	9-8-03	12-10-03	94
64	Unknown acidic	D002	unknown*	12-10-03	?

Drum #	Waste name	Waste code	Accumulation start date	Disposal date	# days stored
66	Unknown acidic	D002	unknown*	12-10-03	?
67	Unknown acidic	D002	8-9-03	12-4-03	118
68	Unknown acidic	D002	9-9-03	12-10-03	93
81	Unknown acidic	D002	10-22-03	12-10-03	50
84	Unknown acidic	D002	10-31-03	12-10-03	41
85	Unknown acidic	D002	9-18-03	12-10-03	40
86	Unknown acidic	D002	unknown*	12-10-03	?
102	Unknown acidic	D002	unknown*	11-17-03	?
103	Unknown acidic	D002	unknown*	12-5-03	?
104	Unknown acidic	D002	unknown*	12-5-03	?
105	Unknown acidic	D002	10-28-03	12-5-03	39
106	Unknown acidic	D002	unknown*	12-10-03	?
107	Unknown acidic	D002	unknown*	12-5-03	?
176	Nickel strip	D002	11-6-03	12-12-03	37

* In a post-inspection telephone conversation, the Facility representative informed the inspector that it was impossible to ascertain the accumulation start dates of these containers, many of whom were stored on the Facility premises when she first began her employment at the Facility in July, 2003.

During the inspection the inspectors informed the Facility representative that all drums of RCRA and non-RCRA hazardous wastes had to conform to the regulatory labeling requirements as described in Title 22 of the California Code of Regulations (CCR). Because the drums were so tightly packed together, approximately half of them lacked access, as is required under CCR Title 22 §66265.35.

The inspectors also noted the following:

- six supersacs (one of which was unlabeled) that were identified by the Facility representative as containing F006 filter cake (Attachment 1, Photo 22) (In the Facility's 12-22-03 letter to EPA, the Facility included a manifest dated 9-12-03 for 2 cubic yard containers of F006 filter cake. This would substantiate the Facility's claim that the

unlabeled supersac of filter cake noted during the 11-17-03 inspection had been there for less than 90 days);

- one 1200-gallon open tank, labeled only "treated sludge" (Attachment 1, Photos 23 and 24). There was a clear liquid in the tank, with approximately 2" of freeboard. In the Facility's December 22, 2003 letter, the Facility identified the tank's contents as "spent cleaner solution", with a D002 RCRA hazardous waste code. The Facility representative was unable to provide an accumulation start date.
- two unlabeled 2500 gallon tanks, filled, according to the Facility representative, with "cadmium treatment coagulate" (Attachment 1, Photo 25), which, per the Facility representative, is part of the closed loop rinse system.

The inspector also noted that there was no immediate access to an internal alarm in the waste storage area, as required under CCR Title 22 §66265.34(a).

- Analytical Lab

The inspectors noted a 1-gallon container with a hazardous waste label that was not filled out, except for the words "Sulfuric Acid" (Attachment 1, Photo 26). In the Facility's letter to EPA dated December 22, 2003 (Attachment 7), the Facility identified this as a product used in lab analysis, not a waste.

The inspectors also noted two open, unlabeled 5-gallon buckets of plating solutions slated for lab analysis, identified as acidic and alkaline titration solutions from lab analysis. Per the facility representative, these solutions are poured back into the tanks after the testing has been completed.

Record Review

Manifests: the inspectors noted no manifest discrepancies.

Biennial Report, Contingency Plan, Training Records: the Facility representative was not able to readily locate these documents. The inspectors requested that, once located, she mail them to the EPA for review. Training records and manifests for 2004, 2003 and 2002 were submitted to EPA in the Facility's December 22, 2003 letter (Attachment 7). No violations were noted upon review of these documents.

The facility's contingency plan was submitted on January 23, 2004. A review of this document revealed that the contingency plan conformed to the regulatory requirements as described in CCR Title 22 §66265.52 except that it lacked a list of all emergency equipment, including the location and brief description of each device.

Post Inspection

On December 2, 2003, EPA mailed to the Facility a 3007(a) Request For Information letter, requesting the following (Attachment 6):

- **In the print-outs provided of 186 waste containers in the waste storage yard:**
 - **the waste codes (RCRA and/or non-RCRA, California only) for the contents of each container;**
 - **the accumulation start date (i.e., when the container was first filled with the waste) with any available documentation, for each container.**
- **Copies of all hazardous waste manifests for the years 2001, 2002 and 2003;**
- **Training records as described in Title 22 of the California Code of Regulations §66265.16(d)(1)-(4), that is:**
 - **the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;**
 - **a written job description for each position listed;**
 - **a written description of the type and amount of both introductory and continuing training that will be given to each person listed above;**
 - **records that document that the training or job experience required have been completed.**
- **Waste determinations of the various unlabeled containers noted along the plating lines during the 11-17-04 inspection (as detailed above in this report).**

The Facility responded with a letter to EPA dated December 22, 2003 (Attachment 7), which included the information referenced in the report above.

On January 23, 2004, the facility submitted a copy of its contingency plan to EPA as described above.

On February 24, 2004 a follow-up Case Development Inspection was conducted on Associated Plating. The inspection revealed that the facility's housekeeping had substantially improved. There were no longer any open, unlabeled waste containers between the plating lines, and the containers previously noted in the waste storage area during the first inspection had been removed.

POTENTIAL RCRA VIOLATIONS

Failure to make a hazardous waste determination

**Title 22 §66262.11
(40 CFR §262.11)**

A person who generates a waste shall determine if that waste is hazardous.

The facility did not make hazardous waste determinations for the wastewater beneath the grate in the stripping room.

Satellite Accumulation Area Labeling Requirements

**Title 22 §66262.34(e)(1)(C);
Title 22 §66262.34(e)(1)(E)
(40 CFR §262.34(c))**

A generator may accumulate as much as 55 gallons of hazardous waste at or near any point of generation if each container used for onsite accumulation is labeled with the words "Hazardous Waste" and with the following information:

(A) the initial date of waste accumulation is clearly marked and visible for inspection on each container used for accumulation of hazardous waste;

(B) composition and physical state of the waste;

(C) the particular hazardous properties of the waste;

(D) the name and address of the person producing the waste.

The following satellite accumulation area hazardous waste containers did not have this labeling information:

- 2 unlabeled 15-gallon carboys of spent sulfuric acid (D002) between Lines 1 and 3;
- 2 15-gallon carboys of F008 hazardous waste between Lines 1 and 3;
- 1 open, 5-gallon red hucket, 1/8 full of F006 hazardous waste between Lines 2 and 4;

**90-Day Hazardous Waste Storage Area
Labeling Requirements**

**Title 22 §66262.34(a)(3) and (f)
(40 CFR §262.34(a)(3))**

- 4 open buckets of alkaline cleaner from
tank skimming (D002) by Line 3;

**Each container used for onsite
accumulation of hazardous waste shall be
labeled or marked clearly with the words
"Hazardous Waste". Additionally, all
containers shall be labeled with the
following information:**

- the initial date of waste accumulation
is clearly marked and visible for
inspection on each container used for
accumulation of hazardous waste;
- composition and physical state of the
waste;
- the particular hazardous properties of
the waste;
- the name and address of the person
producing the waste.

The Facility did not provide this labeling
information for the following waste
containers in the 90-day storage yard:

- All the containers listed in the above
TABLE 1;
- 1 supersac of F006 filter cake;
- 1 1200-gallon tank of D002 spent cleaner
solution.

Open Containers

**Title 22 §66265.173(a) (Article 9)
(40 CFR §265.173(a))**

**Title 22 §66262.34(e)(10) states that a
generator may accumulate hazardous
waste on-site without a permit provided
that the generator complies with the
applicable requirements of articles 9 of
chapter 15. Title 22 §66265.173(a)
(Article 9) states that a container holding
hazardous waste must always be closed
during storage, except when it is
necessary to add or remove waste.**

The following hazardous waste containers were open at the time of the inspection:

- 2 open 15-gallon carboys of F008 RCRA hazardous waste between Lines 1 and 3;
- 1 open, 5-gallon red bucket, 1/8 full of F006 hazardous waste between Lines 2 and 4;
- 4 open buckets of alkaline cleaner from tank skimming (D002) by Line 3;

Storage over 90 days

**Title 22 §66262.34(a)
(40 CFR §262.34(a))**

A (large quantity) generator may accumulate hazardous waste on-site for 90 days or less without a permit.

A minimum of 10 55-gallon drums of D002 nickel stripping solution or unknown acidic solution were stored on the facility premises for over 90 days.

Maintenance and operation of facility

**Title 22 §66265.31
(40 CFR §265.31)**

Per Title 22 §66262.34(a)(4), a generator may accumulate hazardous waste on-site for 90 days without a permit provided that the generator complies with the requirements in articles 3 and 4 of chapter 15 and section 66265.16.

Title 22 §66265.31 (Article 3) states that facilities shall be maintained and operated to minimize the possibility of any unplanned sudden or non-sudden release of hazardous waste which could threaten human health or the environment.

The bermed area beneath the grate in the stripping room was filled with a D002 hazardous waste.

Waste Storage Area Internal Alarm

Title 22 §66265.34(a)

Title 22 §66265.34(a) (Article 3) states

(40 CFR §265.34(a))

whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device.

There was no immediate access to an alarm or communication device in the Facility's waste storage area.

Lack of aisle space

**CCR Title 22 §66265.35
(40 CFR §265.35)**

Title 22 §66265.35 (Article 3) states that the owner must maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment.

Approximately half of the drums in the waste storage yard lacked proper aisle space.

Tanks

- Tank certification
Title 22 §66265.191(a)
(40 CFR §265.191(a))**

Title 22 §66262.34(a) states that a generator may accumulate hazardous waste on-site without a permit provided that the generator complies with the applicable requirements of article 10 of chapter 15. Title 22 §66265.191(a) (Article 10) states that the facility owner must keep on file at the facility a written assessment reviewed and certified by an independent, qualified, professional engineer, that attests to the tank system's integrity.

The facility did not have this assessment performed by a qualified engineer for the 1200-gallon open tank of treated D002 sludge.

- Tank inspections
Title 22 §66265.195
(40 CFR §265.195)**

Title 22 §66265.195 (Article 10) states that the facility owner must inspect hazardous waste tanks daily.

open tank of treated D002 sludge on a daily basis.

Incomplete contingency plan

**Title 22 §66265.52(e)
(40 CFR §265.52(e))**

Title 22 §66265.52(e) (Article 3) states that the contingency plan shall include a list of all emergency equipment, including each device's location and a brief description.

The facility's contingency plan lacked this information.

POTENTIAL NON-RCRA, CALIFORNIA-ONLY VIOLATIONS

Satellite Accumulation Area Labeling Requirements

Title 22 §66262.34(e)(1)(E)

A generator may accumulate as much as 55 gallons of hazardous waste at or near any point of generation if each container used for onsite accumulation is labeled with the words "Hazardous Waste" and with the following information:

- the initial date of waste accumulation is clearly marked and visible for inspection on each container used for accumulation of hazardous waste;**
- composition and physical state of the waste;**
- the particular hazardous properties of the waste;**
- the name and address of the person producing the waste.**

-Four 15-gallon carboys containing spent nickel filters (a non-RCRA, California only hazardous waste) by Line 5 were unlabeled;

- 1 bucket of nickel-plated steel wool (a non-RCRA, California only hazardous waste) in the pumping room was unlabeled.

90-Day Storage Area Labeling Requirements

Requirements

Title 22 §66262.34(f)

Generators who accumulate hazardous waste on site without a permit shall comply with the following requirements:

- the date upon which each period of accumulation begins shall be clearly marked and visible for inspection on each container;

- each container shall be labeled or marked clearly with the words, "Hazardous Waste". Additionally, all containers shall be labeled with:

- composition and physical state of the wastes;
- statement which calls attention to the particular hazardous properties of the waste (e.g., flammable, reactive, etc.);
- name and address of the person producing the waste.

89 55-gallon drums of non-RCRA hazardous waste were unlabeled in the Facility's 90 day storage area.

Storage over 90 days

Title 22 §66262.34(a)

A (large quantity) generator may accumulate hazardous waste on-site for 90 days or less without a permit.

A minimum of 57 55-gallon drums of non-RCRA hazardous waste were stored in the Facility's hazardous waste storage area for over 90 days.

Open Containers

Title 22 §66265.173(a) (Article 9) (40 CFR §265.173(a))

Title 22 §66262.34(a)(1)(A) states that a generator may accumulate hazardous waste on-site without a permit provided that the generator complies with the applicable requirements of articles 9 of chapter 15. Title 22 §66265.173(a) (Article 9) states that a container holding

hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

- Four 15-gallon carboys containing spent nickel filters (a non-RCRA, California only hazardous waste) by Line 5 were open
- One bucket of nickel-plated steel wool (a non-RCRA, California only hazardous waste) in the pumping room was open.

ATTACHMENTS

ATTACHMENT 1:

- Photos

ATTACHMENT 2:

- August 15, 1980 Notification of Hazardous Waste Activity

ATTACHMENT 3:

- November 15, 1999 Notification of Hazardous Waste Activity

ATTACHMENT 4:

- February 2, 2002 Santa Fe Springs Fire Department inspection report

ATTACHMENT 5:

- Map of Facility layout;

ATTACHMENT 6:

- December 2, 2003 3007(a) Request For Information letter from EPA to Facility

ATTACHMENT 7:

- December 22, 2003 response from the Facility

ATTACHMENT 1

Attachment 1- Photos



Photo 1: Spent nickel filter cartridges, Line 5



Photo 2: Line 1 open, unlabeled bucket of black liquid

Attachment 1- Photos



Photo 3: Line 1, open, unlabeled 5-gallon bucket partially full of black liquid

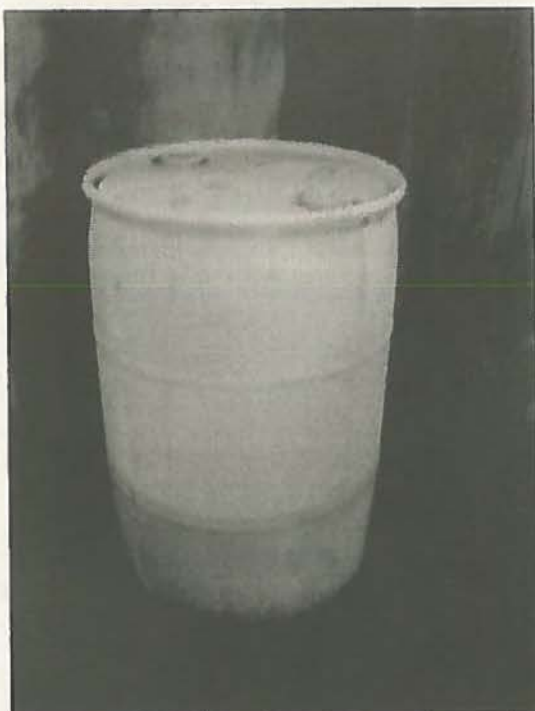


Photo 4: Line 1, open, unlabeled carboy

Attachment 1- Photos



Photo 5: Line 1: Two 30-gallon and one 10-gallon containers, open and unlabeled



Photo 6: Lines 1/3, open, unlabeled 55-gallon drum

Attachment 1- Photos

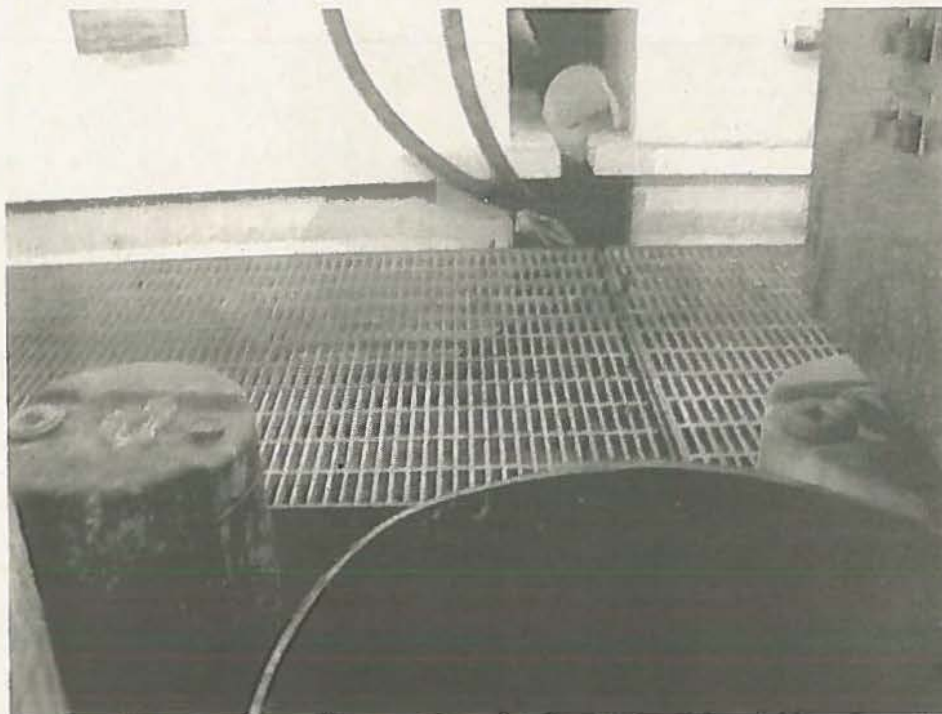


Photo 7: Lines 1/3, two unlabeled 15-gallon carboys



Photo 8: Lines 1/3, open, unlabeled 55-gallon drum

Attachment 1- Photos



Photo 9: Lines 1/3, three open, unlabeled 15-gallon containers



Photo 10: Lines 1/3, four 55-gallon drums, labeled with 3/03 dates

Attachment 1- Photos



Photo 11: Lines 1/3, two unlabeled 15-gallon carboys



Photo 12: Lines 2/4, unlabeled "tubes" filled with milky fluid

Attachment 1- Photos



Photo 13: Lines 2/4, open 5-gallon bucket with "Hazardous Waste" label



Photo 14: Blasting booth with spilled blasting grit on floor

Attachment 1- Photos



Photo 15: Line 3, assorted open, unlabeled containers



Photo 16: Line 3, open, unlabeled 15-gallon container

Attachment 1- Photos



Photo 17: Stripping drum storage area



Photo 18: Stripping area grating (corrosive liquid in area beneath)

Attachment 1- Photos



Photo 19: Hazardous waste storage yard



Photo 20: Hazardous waste storage yard

Attachment 1- Photos



Photo 21: Hazardous waste storage area



Photo 22: Unlabeled supersac of filter cake (F006)

Attachment 1- Photos

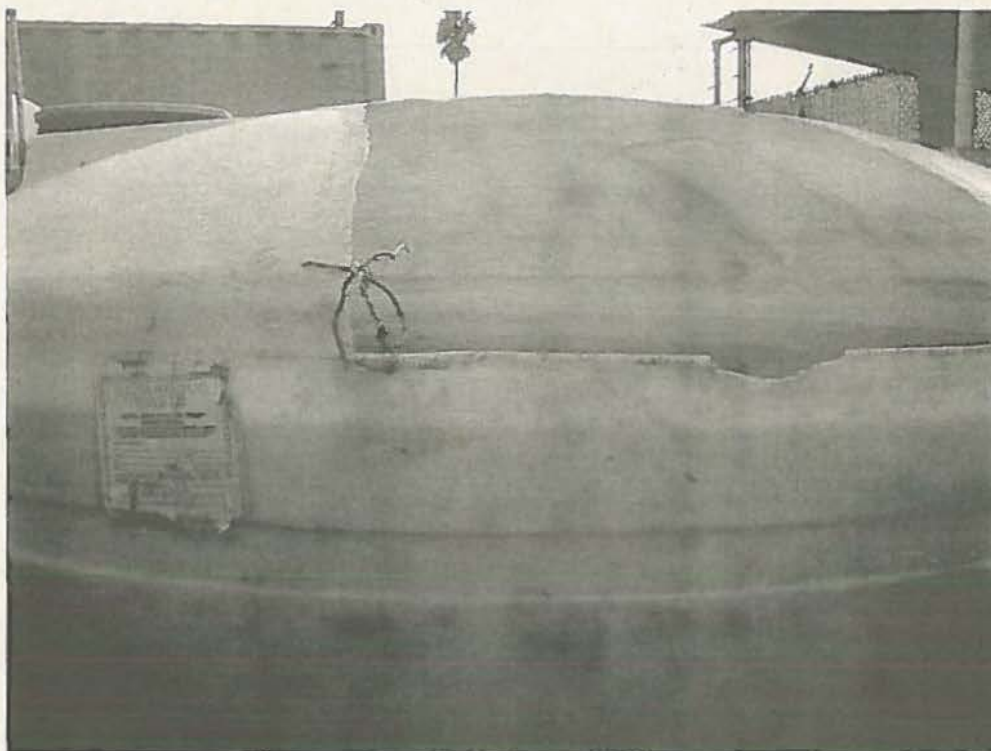


Photo 23: 2300-gallon tank of spent cleaner solution

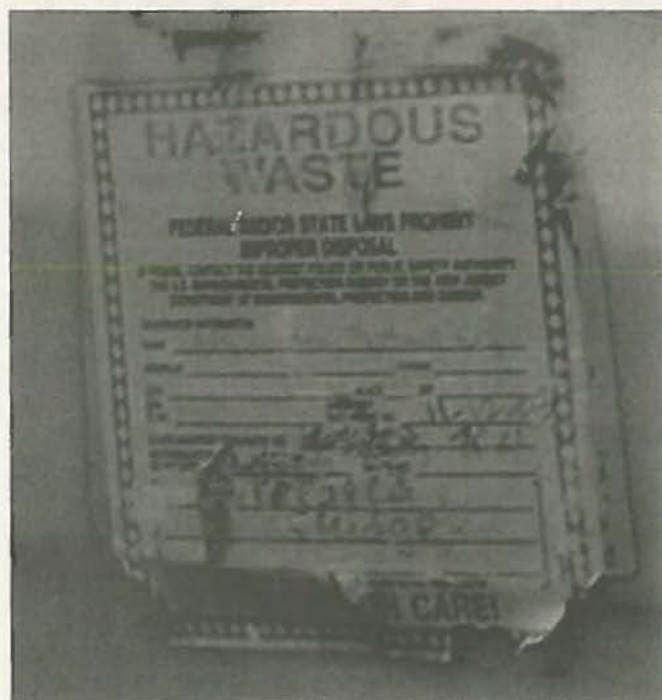


Photo 24: Spent cleaner solution tank label

Attachment 1- Photos



Photo 25: Two 2500-gallon cadmium coagulate rinsewater holding tanks



Photo 26: 1-gallon container with sulfuric acid, labeled "Hazardous"

Attachment 1- Photos

ATTACHMENT 2

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave item I, II, and III blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

PLEASE PLACE LABEL IN THIS SPACE

INSTALLATION'S EPA I.D. NO.
NAME OF INSTALLATION
INSTALLATION MAILING ADDRESS
LOCATION OF INSTALLATION

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER
APPROVED
DATE RECEIVED (yr., mo., & day)
CADD4307911031 18 AUG 1980 02463

NAME OF INSTALLATION

ASSOCIATED PLATING CO

INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX
9636 ANN STREET

CITY OR TOWN
SANTA FE SPRINGS
ST. CA 90670

LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER
SAME 9636 ANN STREET

CITY OR TOWN
SAME SANTA FE SPRINGS
ST. CA 90670

INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)
PHONE NO. (area code & no.)
GOLNICK DARRELL VP 213 945 3555

OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER
GOLNICK STANLEY

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)
1 = FEDERAL
2 = NON-FEDERAL
M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION
☒ C. TREAT/STORE/DISPOSE
☐ B. TRANSPORTATION (complete item VII)
☐ D. UNDERGROUND INJECTION

MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR
☐ B. RAIL
☐ C. HIGHWAY
☐ D. WATER
☐ E. OTHER (specify):

I. FIRST OR SUBSEQUENT NOTIFICATION

Enter "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☐ A. FIRST NOTIFICATION
☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

DESCRIPTION OF HAZARDOUS WASTES

Go to the reverse of this form and provide the requested information.

I.D. - F1		FFIC		USE ONLY	
W	CAD	43	97	91	02
1	2	3	4	5	6

DESCRIPTION OF HAZARDOUS WASTES (continued from front)

HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 FOO1	2 FOO7	3 FOO9	4	5	6
7 FOO6	8 FOO8	9	10	11	12

HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 P029	32 P099	33	34	35	36
37 P030	38 P104	39	40	41	42
43 P098	44 P106	45	46	47	48

LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Part 261.21 - 261.24.)

<input checked="" type="checkbox"/> 1. CORROSIVE	<input checked="" type="checkbox"/> 2. EXTREMELY FLAMMABLE	<input checked="" type="checkbox"/> 3. REACTIVE	<input checked="" type="checkbox"/> 4. TOXIC
--	--	---	--

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) Darrell Golnick V.P.	DATE SIGNED 8/15/80
---	---	------------------------

ATTACHMENT 3

Electronic
Plating
Service, Inc.



A Connector Service Corporation Company

November 15, 1999

US EPA Region 9
Hazardous Waste Management Division
75 Hawthorne Street, H-3-4
San Francisco, CA 94105

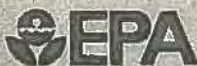
Please find following a Notification of Regulated Waste Activity form for Associated Plating Acquisition Corp. On November 15, 1999, Associated Plating located at 9636 Ann Street, Santa Fe Springs, California changed ownership. The new owner is Antonio Gracias. The operations will remain the same, as well as the on site contact person. The operator will now be Tim Grandcolas, Plant Manager.

If you have any questions, please call Domingo Garcia located at Associated Plating Acquisition Corp. (562) 946-5525 or Cindy Wilson at Electronic Plating Service, Inc. (310) 532-2345 x215.

Regards,

Cindy Wilson
Safety & Environmental Manager

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐ A. Initial Notification ☒ B. Subsequent Notification
(Complete Item C)

C. Installation's EPA ID Number

C A D 0 4 3 0 7 9 1 1 0

II. Name of Installation (Include company and specific site name)

A S S O C I A T E D P L A T I N G A C Q U I S C O R P

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

9 6 3 6 A N N S T R E E T

Street (Continued)

City or Town

S A N T A F E S P R I N G S

State

Zip Code

C A 9 0 6 7 0 - 2 9 9 5

County Code

County Name

L O S A N G E L E S

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

S A M E

City or Town

State

Zip Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

(First)

G A R C I A

D O M I N G O

Job Title

Phone Number (Area Code and Number)

Q A M A N A G E R

5 6 2 - 9 4 6 - 5 5 2 5

VI. Installation Contact Address (See instructions)

A. Contact Address

Location

Mailing

☒

B. Street or P.O. Box

City or Town

State

Zip Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

A N T O N I O G R A C I A S

Street, P.O. Box, or Route Number

1 1 6 W I L L I N O I S S T R E E T S U I T E 3 E

City or Town

State

Zip Code

C H I C A G O

I L 6 0 6 1 0 -

Phone Number (Area Code and Number)

3 1 2 - 3 2 9 - 1 8 0 0

B. Land Type

C. Owner Type

D. Change of Owner Indicator

(Date Changed)

P

P

Yes

X

No

Month

Day

Year

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions)

A. Hazardous Waste Activity

1. Generator (See Instructions)
☒ a. Greater than 1000kg/mo (2,200 lbs.)
☐ b. 100 to 1000 kg/mo (220-2,200 lbs.)
☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
☐ a. For own waste only
☐ b. For commercial purposes
- Mode of Transportation
☐ 1. Air
☐ 2. Rail
☐ 3. Highway
☐ 4. Water
☐ 5. Other - specify _____
3. Treater, Storer, Disposer (at Installation) Note: A permit is required for this activity, see Instructions.
☐ 4. Hazardous Waste Fuel
☐ a. Generator Marketing to Burner
☐ b. Other Marketers
☐ c. Boiler and/or Industrial Furnace
☐ 1. Smelter Refractory
☐ 2. Small Quantity Exemption
 Indicate Type of Combustion Device(s)
☐ 1. Utility Boiler
☐ 2. Industrial Boiler
☐ 3. Industrial Furnace
☐ 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Recycling Marketer
☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device
☐ a. Utility Boiler
☐ b. Industrial Boiler
☐ c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Combustion Device(s)
☐ a. Transporter
☐ b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
☐ a. Process
☐ b. Re-refine

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☐ 2. Corrosive (D002) ☐ 3. Reactive (D003) ☐ 4. Toxicity Characteristic (List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s)) ☐

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See Instructions if you need to list more than 12 waste codes.)

1 D 0 0 3	2 F 0 0 1	3 F 0 0 6	4 D 0 0 2	5 F 0 0 8	6 F 0 0 9
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number; See instructions.)

1 2 2 1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Name and Official Title (Type or print)

Date Signed

TIM GRANDCOLAS PLANT MANAGER 11/15/99

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

ATTACHMENT 4



City of Santa Fe Springs Fire Department

Fire Protection Division Environmental Protection Division

11300 Greenstone Ave. Santa Fe Springs CA 90670-4619 (562) 944-9713 fax (562) 941-1817

NOTICE OF VIOLATION & ORDER TO COMPLY

Business Name	Associated Plating	Contact	Mike Evans
Site Address	9636 Ann	Unit #	
Business Owner		Telephone	(562) 946-5575

Date Inspected 2/7/62 Inspector(s) Richard Kallman

☒ FIRST NOTICE

☐ SECOND NOTICE

**Compliance
Due Date**

3-7-02

Compliance
Due Date

\$ 600 FINE AFTER THIS DATE

\$ 300 FINE AFTER THIS DATE

Failure to comply by the
2nd Notice will result in
additional legal
enforcement action.

Correct the below stated violations, sign and return this form to avoid late fines.

ITEM	PROGRAM	DESCRIPTION	VIOLATION TYPE
1.	HWG	Discontinue storage of wastes for longer than prescribed timeframes (22CCR66262.34(e)(1)).	minor
2.	HWG	Ensure all waste containers are properly labelled (22CCR66262.34(f)).	minor
3.	HWG	Ensure that operations occur in such a way as to prevent releases & wastes are not discharged to the ground (deteriorating/leaking drum, liquid waste on ground, High pH material on ground) (22CCR66265.31, CHS 25189.5(a)).	Class II
4.	HWG	Ensure waste containers are closed except when adding or removing materials (22CCR66265.173(a)).	minor
5.	HWG	Inspect storage areas weekly & Tiered permit unit & waste tanks daily (22CCR66265.174, 66265.175, 66262.34(d)(2)) - Note: Daily inspections conducted, but inconsistent with Findings during inspection (i.e., materials leaked to ground)	Class II
6.	HWG	Ensure personnel receive annual training (22CCR66265.16)	minor
7.	T.P.	Remove spills, leaks from treatment area in timely fashion (HSC 25100.31(c)(4))	Class II
8.	T.P.	Submit notification form prior to treating wastes (HSC 25200.5)	Class II

Page 1 of 2

I have read and understand the above stated violations. After these violations have been corrected, I will sign and return this form to avoid late fines.

Michael P. Brown

SIGNATURE OF RESPONSIBLE PARTY

MICHAEL EVANS

PRINT NAME

2-7-02

DATE _____

The above conditions or practices represent a violation of the referenced code for which there are civil and/or criminal penalties. Failure to correct the above violations by the specified due date may result in legal action being taken against the above parties. The giving of this notice and recent inspection of your facility is not a representation by the City of Santa Fe Springs that no other violations exist on your premises. After you have corrected the violation(s), please sign and print your name along with the date and return this notice with any required documentation to the Santa Fe Springs Fire Department at the above address.

SIGNATURE OF RESPONSIBLE PARTY

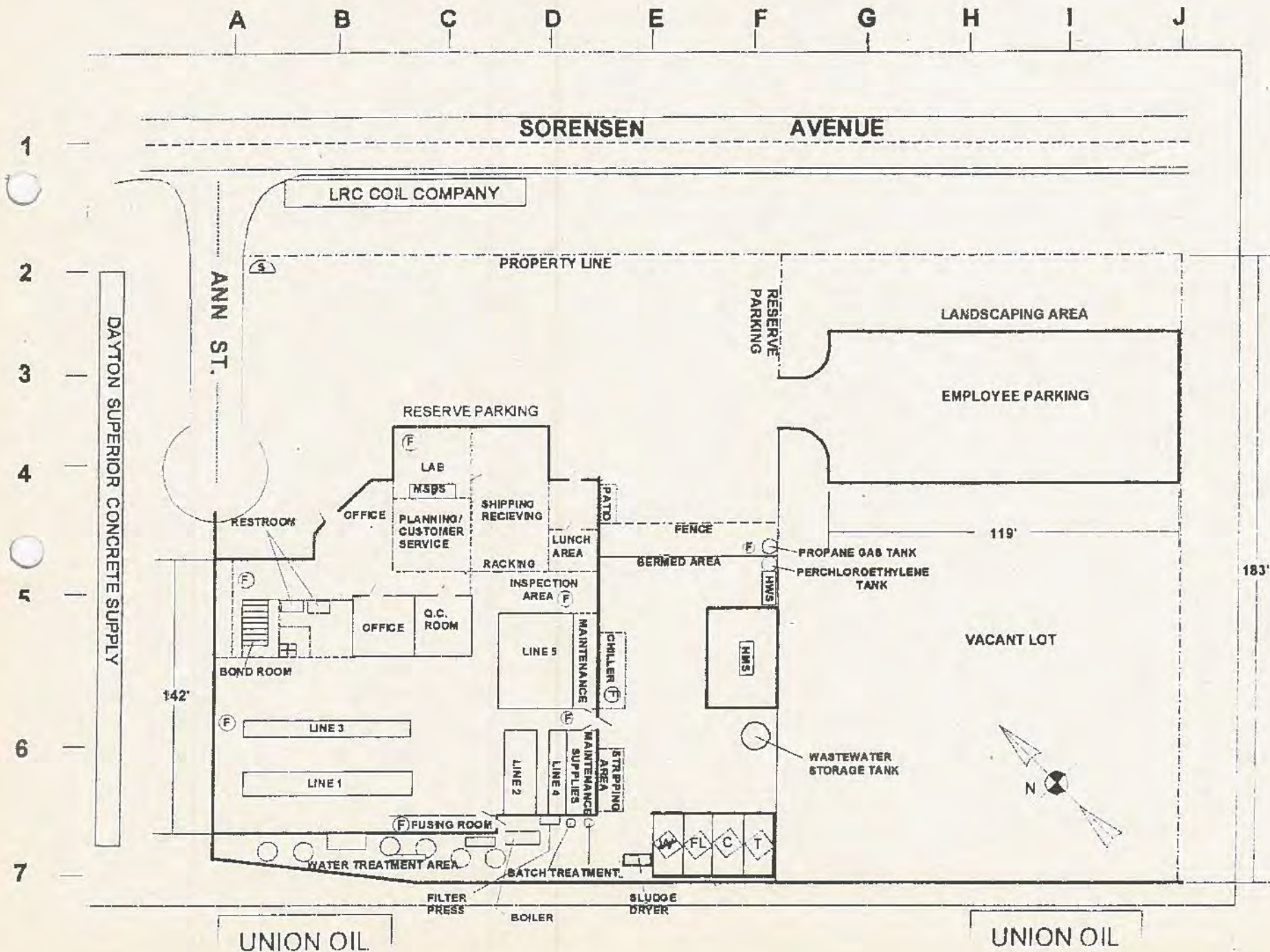
PRINT NAME _____

DATE _____

ATTACHMENT 5

SITE MAP

9636 ANN STREET, SANTA FE SPRINGS, CA 90670



ATTACHMENT 6



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

Certified Mail No. 7001 0320 0002 4541 1288
Return Receipt Requested

DEC 02 2003

In Reply Refer to: Associated Plating Co.
CAD043079110

Ms. Diana Crane
Quality Manager
Associated Plating Co.
9636 Ann St.
Santa Fe Springs, CA 90670

Re: Request for Information Pursuant to 3007(a) of the Resource Conservation and Recovery Act

Dear Ms. Crane:

The purpose of this letter is to direct you or another duly authorized representative of the facility to respond in writing to this request for additional information concerning the hazardous waste inspection conducted at your facility by EPA and the Santa Fe Springs Fire Department inspectors on November 17, 2003.

Under the provisions of Section 3007(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6927(a), the United States Environmental Protection Agency ("EPA") may require persons subject to RCRA to furnish information necessary for EPA to administer the Act. Pursuant to EPA's authority set forth in Section 3007(a), you are requested to submit the following information:

1. In the print-outs you provided the inspectors, 186 containers of waste were identified. Please provide the following information regarding these containers:
 - the waste codes (RCRA and/or non-RCRA, California only) for the contents of each container;
 - the accumulation start date (i.e., when the container was first filled with the waste) with any available documentation, for each container.
2. Please provide EPA copies of all hazardous waste manifests for the years 2001, 2002 and 2003;
3. Please provide EPA with copies of training records as described in Title 22 of the California Code of Regulations §66265.16(d)(1)-(4), that is:
 - the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
 - a written job description for each position listed;

- a written job description for each position listed;
- a written description of the type and amount of both introductory and continuing training that will be given to each person listed above;
- records that document that the training or job experience required have been completed.

4. Please conduct a hazardous waste determination, as required under Title 22 of the California Code of Regulations §66262.11, and provide EPA with the results (including waste code and accumulation start date (if hazardous)) for the following wastes:

- Spent filters from the nickel baths;



- Oily liquid in open, 5-gallon green bucket and open, 5-gallon black bucket, by Line 1;



- Oily liquid in open, 5-gallon blue bucket, with label "electroless Ni solution", by Line 1;



- Yellow liquid in 2 30-gallon white open container and 1 10-gallon, white open container, by Line 1;



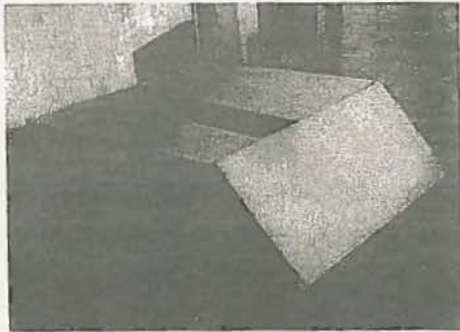
- Contents of unlabeled, black 55-gallon drum, by Line 1;



- Contents of unlabeled, white 55-gallon drum, by Line 1;



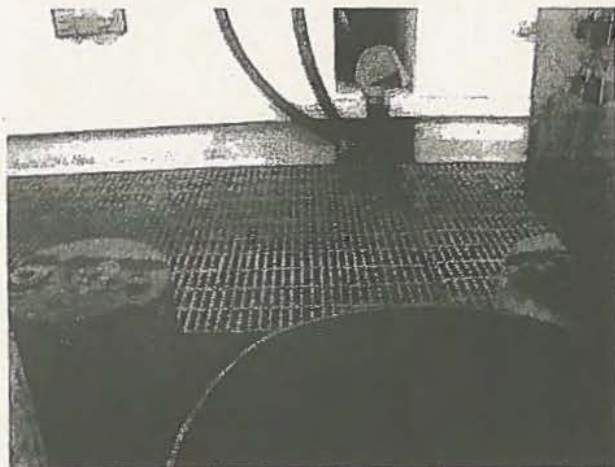
- Nickel filters in box, by Line 1;



- Contents of open, black 55-gallon drum, by Line 1;



- Contents of two unlabeled carboys, by Line 1;



- Contents of open, 55-gallon drum between Lines 1 and 3;



- Contents of 3 open, black containers between Lines 1 and 3;



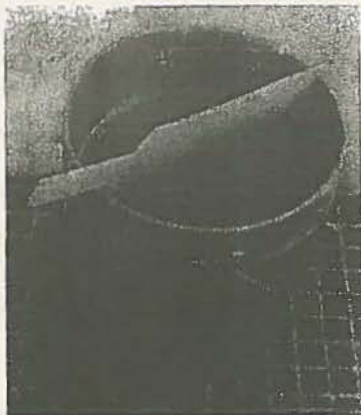
- Contents of 4 55-gallon plastic drums, dated "3/03" and labeled "copper floor", between Lines 1 and 3;



- Contents of 2 open black 15-gallon containers and 1 open 5-gallon white bucket between Lines 1 and 3;



- Contents of open 5-gallon green bucket between Lines 1 and 3;



- Contents of 2 (1 open, 1 closed) white 5-gallon buckets, 1 black cylinder, 1 open blue 5-gallon bucket by Line 2;



- Contents of two open, unlabeled 5-gallon buckets (1 white, 1 red) by Line 2;



- Spent blasting media from sand blaster;



- Contents of open, 5-gallon white bucket in Maintenance Supplies Room;



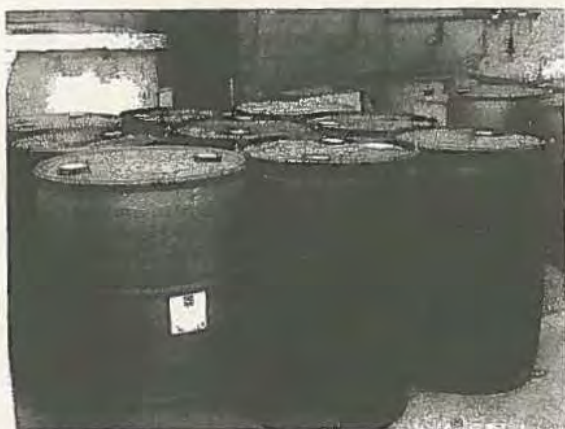
- Contents of 2 white open 5-gallon buckets, 1 open 7-gallon red bucket, and one blue container by Line 3, north side;



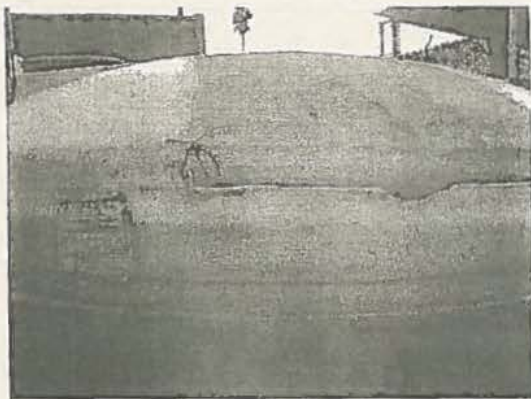
- Contents of open blue container, north side of building;



- Contents of all 21 55-gallon drums in the outside stripping area;



- Contents of white, open, polyurethane domed tank in waste storage yard (along with documentation of accumulation start date);



- Contents of 4 unmarked 55-gallon drums behind the polyurethane tank;



- Contents of one blue, open drum in front of decommissioned cadmium holding tanks;



- Contents of two holding tanks in outdoor storage area;



- Contents of 12 unlabeled 55-gallon drums along south wall by facility's wastewater treatment plant;



- Contents of laboratory waste containers;



Section 3008 of RCRA, 42 U.S.C. 6928, authorizes the initiation of a civil enforcement proceeding for failure to respond fully to the information request set out in this letter. Section 3008 also authorizes criminal prosecution for knowingly making a false statement or omitting material information.

EPA regulations governing confidentiality of business information are set forth in 40 C.F.R. Part 2, Subpart B. For any portion of the information submitted which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. 2.203(b). If EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. 2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim with your response with this letter as a waiver of that claim, and information may be made available to the public by EPA without further notice.

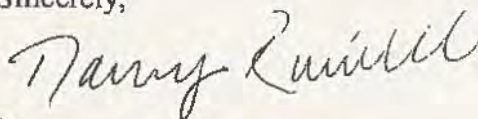
This request for information is not subject to review by the Office of Management and Budget ("OMB") under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1). See, also, 5 C.F.R. §§ 1320.3(c), 1320.4, and 1320.6(a). Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons. 44 U.S.C. §3502(4), (11); 5 C.F.R. §§ 1320.4 and 1320.6(a).

Your response to this request must be made by letter, signed by a duly authorized official, and submitted to EPA within **twenty-one (21)** calendar days from the date of receipt of this letter. Please address the submittal to:

Clint Seiter
Mailcode: WST-3
RCRA Enforcement Section
U.S. Environmental Protection Agency,
75 Hawthorne Street
San Francisco, CA 94105

If you have any questions regarding this matter, please contact Clint Seiter at (415)972-3298. Your cooperation in this matter is appreciated.

Sincerely,


for Frances Schultz, Manager
RCRA Enforcement Office

cc: Steve Lavinger, DTSC
Richard Kallman, Santa Fe Springs Fire Department

ATTACHMENT 7



December 22, 2003

Mr. Clint Seiter
RCRA Enforcement Section
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Mr. Seiter:

This letter is in response to the request for additional information concerning the hazardous waste inspection conducted at Associated Plating Company, 9636 Ann Street, Santa Fe Springs, CA 90670 on November 17, 2003. In response to the four items requested, the following is submitted:

1. Printouts that were provided to the inspectors of the listing the 186 drums with the addition of the waste codes, if applicable, and the accumulation start dates. See attachment A.
2. Copies of all hazardous waste manifests for the years 2001, 2002, and 2003. See Attachment B.
3. The job title for each position related to hazardous waste management, the name of each employee filling each job, a written job description for each position listed, a written description of the type and amount of both introductory and continuing training that will be given to each person listed above, and records that document that the training or job experience required has been completed. See Attachment C.
 - (A) The job title for the position related to hazardous waste management is Waste Treatment Operator, and is listed as such on Associated Plating Company's census. The employees who perform this job function are Ken Hergesheimer and Gerardo Herrera.
 - (B) The job description to the Waste Treatment Operator is contained in Attachment C.
 - (C) The type and amount of both introductory and continuing training that will be given to each person filling the position is contained in the job description for the position. See Attachment C.
 - (D) Training records are contained in Attachment D.
4. The results of the hazardous waste determination for the materials depicted in the photographs provided. The waste codes, if applicable, and accumulation start dates, if the material is a hazardous waste, have been included. In addition, photographs taken by Associated Plating Company after the inspection have been used to further illustrate and document container contents. See Attachment D.

If you have any questions, comments, or need additional information, please feel free to contact me at (562) 946-5525.

Regards,

A handwritten signature in cursive script that reads 'Diana F. Crane'.

Diana F. Crane
Vice President of Quality

cc: Richard Kallman, Santa Fe Springs Fire Department

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Received by (Please Print Clearly) <i>Ramona BAIK</i> B. Date of Delivery <i>8/22/04</i></p> <p>C. Signature <i>X Ramona BAIK</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>1. Article Addressed to: <i>Diana Crane</i> <i>Quality Manager</i> <i>Associated Plating Co</i> <i>9636 Ann St.</i> <i>Santa Fe Springs CA 90670</i></p>		<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. </p>	
<p>2. Article Number (Copy from service label) <i>7001 0320 0002 4540 8653</i></p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
PS Form 3811, July 1999		Domestic Return Receipt 102595-00-M-0952	

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
OFFICIAL USE	
Postage \$	Postmark Here
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Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
<p>Sent To <i>Associated Plating Co.</i> Street, Apt. No., or PO Box No. <i>9636 Ann St.</i> <i>90670</i> City, State, ZIP+4 <i>Santa Fe Springs CA</i></p>	
PS Form 3800, January 2001 See Reverse for Instructions	